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*Pro se* Plaintiff

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12 Attorneys for Defendant  
13 Meta Platforms, Inc.

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13

14 TIARA N. JOHNSON,

15 Plaintiff,

16 v.

17 META PLATFORMS, INC.  
18 (f/k/a FACEBOOK, INC.)

19 Defendant.

Case No. 22-cv-05691-BLF

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO SET  
BRIEFING SCHEDULE**

1 Plaintiff Tiara N. Johnson (“Plaintiff”) and Defendant Meta Platforms, Inc. (“Meta”, f/k/a  
2 Facebook) (collectively the “Parties”), by and through their counsel of record, hereby stipulate,  
3 subject to approval of the Court, as follows:

4 1. On December 2, 2021, Plaintiff filed a Complaint against Meta in Maryland state  
5 court. *Johnson v. Facebook, Inc.*, Case No. C-12-CV-21-000726.

6 2. On January 7, 2022, Meta removed the case to the District of Maryland, pursuant to  
7 28 U.S.C. §§ 1332, 1441, and 1446. *Johnson v. Facebook, Inc.*, Case No. 1:22-cv-00033.

8 3. On February 10, 2022, Plaintiff filed a First Amended Complaint (“FAC”), asserting  
9 claims for: (1) breach of contract; (2) tortious interference with contractual relations; (3) tortious  
10 interference with prospective relations; (4) federal trademark infringement; and (5) federal unfair  
11 competition.

12 4. On March 10, 2022, Meta filed a Motion to Dismiss or in the Alternative to Transfer  
13 Venue, requesting that the district court transfer the case from the District of Maryland to the  
14 Northern District of California, pursuant to the binding forum selection clause in Instagram’s Terms  
15 of Use to which Plaintiff assented when she opened her Instagram account.

16 5. On October 3, 2022, the court granted Meta’s motion and transferred the case to the  
17 Northern District of California.

18 6. On October 4, 2022, the Court set the following case management schedule:

- 19 • December 29, 2022: Last day to meet and confer re: initial disclosures, early  
20 settlement, ADR process selection, and discovery plan;
- 21 • January 12, 2023: Last day to file a Rule 26(f) Report, complete initial  
22 disclosures, and file a Case Management Statement;
- 23 • January 19, 2023 at 11:00 AM: Initial Case Management Conference in:

24 Courtroom 3, 5th Floor  
25 Robert F. Peckham Federal Building  
26 280 South 1st Street  
27 San Jose, CA 95113  
28

7. The parties have met and conferred in good faith and have agreed, subject to the Court's approval, to the following briefing schedule:

Date	Event
January 27, 2023	Meta's Motion to Dismiss Plaintiff's FAC is due
February 27, 2023	Plaintiff's Opposition to Meta's Motion to Dismiss is due
March 13, 2023	Meta's Reply in Support of Its Motion to Dismiss is due
March 16, 2023 at 9:00 AM	Hearing regarding Meta's Motion to Dismiss Plaintiff's FAC

8. Moreover, in light of the above briefing schedule and in the interest of efficiency and conservation of Court resources, the parties have likewise agreed, subject to the Court's approval, to continue the Case Management Conference and all affiliated dates as follows:

Date	Event
February 27, 2023	Last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan
March 13, 2023	Last day to file a Rule 26(f) Report, complete initial disclosures, and file a Case Management Statement
March 16, 2023 at 11:00 AM	Initial Case Management Conference

NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

1. January 27, 2023: Meta's Motion to Dismiss Plaintiff's FAC is due
2. February 27, 2023: Plaintiff's Opposition to Meta's Motion to Dismiss is due
3. February 27, 2023: Last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan
4. March 13, 2023: Meta's Reply in Support of Its Motion to Dismiss is due
5. March 13, 2023: Last day to file a Rule 26(f) Report, complete initial disclosures, and file a Case Management Statement

- 1                   6. March 16, 2023 at 9:00 AM: Hearing regarding Meta’s Motion to Dismiss  
2                   Plaintiff’s FAC  
3                   7. March 16, 2023 at 11:00 AM: Initial Case Management Conference  
4

5 Dated: December 15, 2022

Respectfully submitted,

6 ORRICK, HERRINGTON & SUTTCLIFFE LLP  
7

8 By: /s/ Jacob M. Heath  
9 Jacob M. Heath

10 Attorney for Defendant  
Meta Platforms, Inc.

11 By: /s/ Tiara N. Johnson  
12 Tiara N. Johnson

13 *Pro se* Plaintiff  
14

15 **CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

16 I hereby attest that concurrence in the filing of this document has been obtained from each  
17 of the other signatories hereto.

18 Dated: December 15, 2022

ORRICK, HERRINGTON & SUTTCLIFFE LLP

19  
20 /s/ Jacob M. Heath  
21 Jacob M. Heath

22 Attorney for Defendant  
23 Meta Platforms, Inc.  
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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE BETH LABSON FREEMAN  
United States District Judge